

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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THE ESTATE OF JAMES FRANKLIN  
PERRY, by NATHANIEL CADE, JR., ,  
Special Administrator, and JAMES  
FRANKLIN PERRY, JR. (a Minor),

Plaintiffs,

Case No. 12-CV-664-JPS

vs.

CHERYL WENZEL, R.N.; *et al.*,

Defendants.

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**SPECIAL VERDICT**

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We, the jury, duly impaneled and sworn, for our special verdict in the above-entitled action, find as follows:

**QUESTION NO. 1:** Did defendants deny James Franklin Perry medical care in violation his constitutional rights on September 13, 2010?

Alexander C. Ayala: \_\_\_\_\_ (Yes or No)

Rick Bungert: \_\_\_\_\_ (Yes or No)

Margarita Diaz-Berg: \_\_\_\_\_ (Yes or No)

Jacob Ivy: \_\_\_\_\_ (Yes or No)

Crystal Jacks: \_\_\_\_\_ (Yes or No)

Corey Kroes: \_\_\_\_\_ (Yes or No)

Luke Lee: \_\_\_\_\_ (Yes or No)

Richard Lopez: \_\_\_\_\_ (Yes or No)

Karl Robbins: \_\_\_\_\_ (Yes or No)

Frank Salinsky: \_\_\_\_\_ (Yes or No)

EXHIBIT

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Froilan Santiago: \_\_\_\_\_ (Yes or No)

If you answered "Yes" to any defendant in Question No. 1, answer Question No. 2. Otherwise, STOP.

QUESTION NO. 2: What sum of money, if any, will fairly and reasonably compensate the Estate of James Franklin Perry for any harm caused by the defendant(s) for whom you answered "Yes" in Question No. 1?

Answer: \$\_\_\_\_\_

Regardless of how you answered Question No. 2, answer Question No. 3, but only with respect to the defendant(s) for whom you answered "Yes" in Question No. 1.

QUESTION NO. 3: Is the Estate of James Franklin Perry entitled to recover punitive damages from the defendants?

Alexander C. Ayala: \_\_\_\_\_ (Yes or No)

Rick Bungert: \_\_\_\_\_ (Yes or No)

Margarita Diaz-Berg: \_\_\_\_\_ (Yes or No)

Jacob Ivy: \_\_\_\_\_ (Yes or No)

Crystal Jacks: \_\_\_\_\_ (Yes or No)

Corey Kroes: \_\_\_\_\_ (Yes or No)

Luke Lee: \_\_\_\_\_ (Yes or No)

Richard Lopez: \_\_\_\_\_ (Yes or No)

Karl Robbins: \_\_\_\_\_ (Yes or No)

Frank Salinsky: \_\_\_\_\_ (Yes or No)

Froilan Santiago: \_\_\_\_\_ (Yes or No)

If you answered "Yes" to any defendant in Question No. 3, answer Question No. 4. Otherwise, proceed to Question No. 5.

QUESTION NO. 4: What amount of punitive damages is the Estate of James Franklin Perry entitled to recover from the defendant(s) for whom you answered "Yes" to Question No. 3?

Alexander C. Ayala: \$\_\_\_\_\_

Rick Bungert: \$\_\_\_\_\_

Margarita Diaz-Berg: \$\_\_\_\_\_

Jacob Ivy: \$\_\_\_\_\_

Crystal Jacks: \$\_\_\_\_\_

Corey Kroes: \$\_\_\_\_\_

Luke Lee: \$\_\_\_\_\_

Richard Lopez: \$\_\_\_\_\_

Karl Robbins: \$\_\_\_\_\_

Frank Salinsky: \$\_\_\_\_\_

Froilan Santiago: \$\_\_\_\_\_

Regardless of how you answered Question No. 4, answer Question No. 5.

QUESTION NO. 5: What sum of money, if any, will fairly and reasonably compensate James Franklin Perry, Jr. for any loss of society and companionship of his father caused by the defendant(s) for whom you answered "Yes" in Question No. 1?<sup>1</sup>

Answer: \$\_\_\_\_\_

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<sup>1</sup> As reflected in the Pretrial Report, the parties disagree as to whether any claim by James Franklin Perry, Jr. for loss of society and companionship may be maintained and/or submitted to the jury.